

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:) CASE NO. 21-02909-hb
)
THE MUFFIN MAM, INC.)
) CHAPTER 7
Debtor.)
)
)
_____)

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned, David B. Wheeler, of the law firm of Moore & Van Allen, PLLC, hereby appears on behalf of Creditor Pinnacle Bank in the above-captioned case and demands that notices of all matters be served on him at the address set forth below.

Please take further notice that demand is also made for service of copies of papers, reports, pleadings, monthly operating statements, motions and applications, petitions, and any other matter filed in this action, including any adversary proceedings.

The full address for such service and notice is as follows:

David B. Wheeler
Moore & Van Allen PLLC
78 Wentworth Street
Post Office Box 22828
Charleston, SC 29413-2828

Telephone: (843) 579-7015
Facsimile: (843) 579-8727

davidwheeler@mvalaw.com

Please take further notice that said Creditor intends that neither this Notice of Appearance nor any later appearance, pleadings, claim, or suit shall waive (1) the right of Creditor to have final orders in non-core matters entered only after de novo review by the District Court, (2) the rights

of said Creditor to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) the right of said Creditor to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, or recoupment to which said Creditor is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, or recoupment said Creditor expressly reserves.

/s/David B. Wheeler
David B. Wheeler, #4601
Reid E. Dyer, #10723
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ATTORNEYS FOR CREDITOR,
PINNACLE BANK

CHARLESTON, SC

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The undersigned hereby certifies that on the 10th day of November, 2021, a copy of the attached was served on the parties listed below by CM/ECF.

William Harrison Penn, Esquire (VIA CM/ECF ONLY)
McCarthy, Reynolds & Penn, LLC
1517 Laurel Street
PO Box 11332
Columbia, SC 29211-1332

John K. Fort (VIA CM/ECF ONLY)
Chapter 7 Trustee
PO Box 789
Drayton, SC 29333

/s/Julie M. Chanson
Julie M. Chanson, Paralegal
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